Memo To Members & Partners
A weekly newsletter from the National Low Income Housing Coalition

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HoUSed Campaign for Universal, Stable, Affordable Homes

Only One Week Left to Submit Comments in Support of Federal Renter Protections – Submit Yours Today and Join NLIHC's Support Letter!

The Federal Housing Finance Agency (FHFA) has received more than 1,700 comments in response to its Request for Input (RFI) regarding the creation of tenant protections at multifamily properties with FHFA-backed mortgages (see *Memo*, 6/5). National organizations and tenant leaders are calling for a robust response to the RFI, as any renter protections created by FHFA could cover a significant share of renters across the nation. Advocates have one more week – until July 31 – to weigh in with FHFA to demand and help shape strong renter protections. NLIHC has several opportunities for tenant leaders and other advocates to engage, including a sample comment letter for individual comments, an organizational sign-on letter in support of tenant protections, and a weekly Renter Protections working group to inform NLIHC's comment letter.

Landlords and business interests have submitted hundreds of comments against tenant protections. It is up to tenants and advocates to voice their support for federal renter protections like source-of-income discrimination prohibitions, just cause eviction standards, and anti-rent gouging measures. Submit your comment today, and learn more about other tenant protections at www.tenantcomment.org

Organizations involved with NLIHC's HoUSed campaign may be particularly interested in signing NLIHC's organizational sign-on letter, which calls for a major priority in the HoUSed campaign's policy agenda: strengthening federal renter protections. NLIHC's Renter Protections working group will meet once more this month – on July 26 at 4 pm ET – to finalize NLIHC's comment letter. NLIHC urges all organizations – local, state, and national – to join efforts to support federal renter protections by taking action below.

Take Action!

NLIHC urges tenant leaders and other advocates to respond to relevant questions in the RFI; you do not need to respond to every RFI question, just those that you have some experience with or have ideas about. In addition to responding to the RFI questions, you can offer other suggestions for providing strong tenant protections. *Remember: comments will be made public on FHFA's website, so please do not include personal identifying information.*

Take action by:

- Submitting your own comments by July 31. It is crucial that FHFA hear from you and as many tenant leaders and other advocates as possible in support of renter protections. Use NLIHC's sample comment letter and resources from www.tenantcomment.org to craft your comments and submit them using a direct portal here.
- Signing your organization on to NLIHC's national support letter calling on FHFA to create strong federal renter protections.
- Joining our final working group on Renter Protections on July 26 at 4 pm ET to help finalize NLIHC's comment letter. Register for the meeting here.

Read more about the Federal Housing Finance Agency and NLIHC's opportunities for engagement at: https://tinyurl.com/mr473235

Read submitted comments on FHFA's website (choose "Tenant Protections" in the drop-down menu) at: https://www.fhfa.gov/AboutUs/Contact/Pages/input-submissions.aspx

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NLIHC Releases Updated Advocacy Toolkit ahead of August Recess

NLIHC released on July 20 an updated advocacy toolkit to help advocates take action on affordable housing and homelessness during Congress's upcoming August recess. The *Congressional Recess Toolkit* offers comprehensive information about how to host site visits and in-district meetings with members of Congress and provides ideas about ways to advocate for increased federal funding for affordable housing and homelessness assistance programs and for evidence-based solutions to homelessness, like Housing First. Download the toolkit here.

August recess is an ideal time for advocates to weigh in directly with their elected officials, including by scheduling in-district meetings with their members; inviting members of Congress to tour affordable housing developments or Housing First programs; and using social media to amplify messages and stories about the importance of these programs.

The *Congressional Recess Toolkit* includes key resources advocates can use when trying to build Congressional support for the large-scale, sustained investments needed to address the affordable housing and homelessness crisis. These resources include talking points regarding Housing First and the federal budget, storytelling tips and tricks, social media messages, guidance on how to host site visits and conduct in-district meetings, and more.

Background

Even before the pandemic, half a million people experienced homelessness on any given night, and millions of extremely low-income households were struggling to keep roofs over their heads. When the COVID-19 pandemic hit and 12 million households were suddenly at risk of losing their homes, advocates pushed the federal government to take immediate action. The government responded with unprecedented resources and protections to keep tenants housed.

Now, pandemic resources are dwindling and some renter protections are expiring. Renters face a range of issues threatening their housing security, including increased eviction filings in many communities, record-breaking rents, and wages that have not kept pace with the increased cost of living. These factors, combined with a national shortage of 7.3 million units of affordable housing for those with the lowest incomes, have led to more people – including families with children and older adults – being pushed into homelessness.

At the same time, dangerous anti-homelessness rhetoric is gaining traction in some states and communities, and Congress continues to underfund the vital programs that help people with the lowest incomes find and maintain affordable, accessible housing. Some misguided policymakers are turning away from solutions that work to push instead for harmful measures criminalizing homelessness, imposing punitive requirements to obtain housing, and even preventing the development of affordable housing. These approaches are counterproductive and dehumanizing and will make it even harder for people to exit homelessness.

In August, members of Congress leave their offices in D.C. to return to their home districts and states. Known as "August recess," this time is used by members to attend community meetings and hear from their constituents about the issues impacting them. August recess is also the perfect time for advocates to set up in-district meetings with their members and let their elected officials know about the importance of increased funding for HUD's vital affordable housing and homelessness programs.

Take Action!

It was thanks to the hard work of advocates across the country in mobilizing to weigh in with their elected officials that Congress provided the unprecedented resources and protections needed to keep renters safe during the pandemic. Advocates mobilized once again to push House appropriators to spare HUD's vital rental assistance, homelessness assistance, and tribal housing programs from what were expected to be draconian cuts in the House's proposed budget.

These successes prove that, together, we can make our voices heard and protect the individuals, families, and communities that rely on HUD programs. But we have more work to do to ensure these funding levels remain in a final bill and that other critical programs, such as public housing, are also fully funded.

Use the newly updated *Congressional Recess Toolkit* for ideas, tips, and guidance on how you can continue weighing in with your members of Congress. Advocates can also take action TODAY in the following ways:

- Contact your senators and representatives to urge them to expand – not cut – investments in affordable, accessible homes through the FY24 spending bill, including NLIHC's top priorities:
  - Implementing full funding for the Tenant-Based Rental Assistance (TBRA) program to renew all existing contracts.
  - Providing full funding for public housing operations and repairs.
  - Fully funding homelessness assistance grants.
  - Providing $100 million for legal assistance to prevent evictions.
  - Funding a permanent Emergency Rental Assistance program.
  - Maintaining funding for competitive tribal housing grants for tribes with the greatest needs.
- Join over 2,000 organizations by signing on to a national letter from the Campaign for Housing and Community Development Funding (CHCDF), calling on Congress to oppose budget cuts and instead to support the highest level of funding possible for affordable housing, homelessness, and community development resources in FY24.

Biden-Harris Administration Announces New Actions to Reduce Junk Fees in Rental Housing

The Biden-Harris administration announced on July 19 actions to “crack down on junk fees” in rental housing. Rental housing junk fees include application fees, convenience fees for online payments, and fees for trash collection. The new actions follow an open call issued by HUD Secretary Marcia L. Fudge for rental housing providers to create a fairer and more transparent rental market (see *Memo* 3/13). In response, Zillow, Apartments.com, and AffordableHousing.com have each announced new steps to provide information about fees for tenants before they sign a lease.

To promote efforts to crack down on fees, HUD released a research brief on rental fees that highlights state, local, and private sector strategies to encourage transparency and fairness in the market. Likewise, the White House has praised recent state actions to address hidden rental fees in response to the publication of a March resource for states addressing how they can reduce junk fees across sectors. The new White House announcement, which also flags an upcoming July 26 Subcommittee on Senate Banking, Housing and Urban Affairs hearing on rental fees, is another indication of the Biden-Harris administration’s support for renters, exemplified in its *Blueprint for a Renters Bill of Rights* (see *Memo* 1/30).

Junk fees in the rental market are hidden, duplicative, and unnecessary fees that create a financial burden for low-income renters. Renters must often apply for several units, incurring many non-refundable costs, such as rental application fees, administrative fees, and other processing fees, which can add up to hundreds and even thousands of dollars. These fees are a significant burden for renters and are often used to pay for tenant screening reports that may provide landlords or rental companies with inaccurate information. The process can prevent renters from being selected for a unit, deplete their funds, and complicate and delay their ability to find affordable housing. Eliminating unnecessary rental fees is a part of NLIHC’s HoUSed campaign to expand renter protections, which includes requiring landlords to disclose any and all fees in advance of lease signing.

NLIHC took issue with rental junk fees in a comment letter sent to the Consumer Financial Protection Bureau (CFPB) and the Federal Trade Commission (FTC) in response to a request for input on tenant screening practices (see *Memo* 6/5). “Landlords and property managers can profit immensely off charging non-refundable rental application and screening fees to prospective tenants, even knowing that only one applicant will ultimately be selected,” the comment letter stated. “For individuals and families with extremely low incomes, application fees can be an insurmountable barrier to affordable housing. Extremely low-income households – those earning 30% or less of Area Median Income (AMI), or less than the federal poverty guideline – have limited money available to spend on repeated application fees, which can quickly add up and drain any available savings.”

While the commitments from Zillow, Apartments.com, and AffordableHousing.com are voluntary, they signal an effort by rental housing industry providers to provide more transparency regarding junk fees and to work with HUD and the Biden-Harris administration to reduce surprise fees affecting access to vital housing. “Too often, renters are hit with unexpected fees on top of their rent,” said HUD Secretary Marcia L. Fudge. “Today’s announcement shows the Biden-Harris administration’s commitment to lower costs for renters and build a fairer, more transparent rental housing marketplace.”

Read the White House announcement on rental junk fees at: https://tinyurl.com/fs78xb7y

Read the HUD press statement at: https://tinyurl.com/388u87zp

Read HUD's research brief on rental fees at: https://tinyurl.com/53z7kkwn

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Recap of July 17 National HoUSed Campaign Call

NLIHC hosted a national HoUSed campaign call on July 17. We were joined by Special Assistant to the President for Housing and Urban Policy Chad Maisel, who discussed "All INside," the Biden-Harris administration's new initiative to address the needs of people experiencing homelessness. The initiative, a key part of the administration's *All In: The Federal Strategic Plan to Prevent and End Homelessness*, creates partnerships between the U.S. Interagency Council on Homelessness (USICH), its 19 federal member agencies, and selected state and local governments to accelerate and strengthen local efforts to get people experiencing unsheltered homelessness into homes.

Henry Gomory, graduate research assistant at Eviction Lab at Princeton University, shared findings from a new research study examining the relationship between the cost of eviction filing fees and eviction rates. The study, "The Racially Disparate Influence of Filing Fees on Eviction Rates," shows that eviction filing fees have a large impact on eviction practices: higher filing fees are associated with lower eviction filing rates and lower eviction judgement rates. The study also finds that these effects are more pronounced in areas with majority Black populations, which suggests that lower eviction filing fees – which are associated with increased eviction filing rates and eviction judgement rates – disproportionately impact Black renters.

Federal Housing Finance Agency (FHFA) Associate Director of the Office of Multifamily Analytics and Policy Siobhan Kelly joined the call to remind listeners about FHFA's Request for Input (RFI) on tenant protections. FHFA provides financing for many multifamily rental properties across the country, so any renter protections created by the agency could cover a significant share of renters across the nation and put America on a pathway towards stronger protections for all renters. NLIHC's Kayla Laywell, policy analyst, also joined the call to share opportunities for listeners to get involved, including by submitting their own comments to FHFA by July 31, using NLIHC's sample RFI comment letter.

We received field updates from South Carolina Appleseed Legal Justice Center's Bach Pham, digital strategy and communication manager, and Sloan Wilson, the organization's housing justice organizer. Andrea Davis, executive director at Homeword, shared updates on her organization's work increasing resources for affordable housing – including permanent supportive housing – in Montana.

NLIHC's Policy Manager Kim Johnson provided an update on the fiscal year (FY) 2024 appropriations process, including an overview of the House's proposed Transportation, Housing and Urban Development (THUD) budget. The spending bill proposes deep cuts to or even elimination of some HUD programs but does – as NLIHC and our partners urged – adequately fund most rental assistance programs. Read NLIHC's full analysis, and see our updated budget chart for more information.

A recording of the call, as well as the presentation slides, are now available.

Join NLIHC's biweekly national HoUSed campaign call every other Monday at 2:30 pm ET to learn more about how to advance long-term solutions to end the housing crisis and achieve housing justice. **The next national call will be held July 31, from 2:30 to 4 pm ET**. Register for the call here: https://tinyurl.com/ru73qan

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Budget and Appropriations

Senate Releases FY24 THUD Spending Bill Proposing Some Cuts but Overall Increases to Maintain Current Levels of Assistance Offered by HUD Programs

The U.S. Senate's Committee on Appropriations' Subcommittee on Transportation, Housing and Urban Development (THUD) released on July 20 its draft spending bill for fiscal year (FY) 2024. Overall, the bill provides $70.06 billion for HUD's affordable housing, homelessness, and community development programs, an increase of $8.26 billion (or slightly more than 13%) over FY23-enacted levels. HUD needs to increase funding by approximately $13 billion just to maintain existing levels of assistance. For more details about the proposal, see NLIHC's full analysis of the Senate bill and updated budget chart. Read NLIHC's analysis of the House draft spending bill here.

The Senate draft bill proposes $1.86 billion more in funding for HUD's vital affordable housing and homelessness programs than the draft spending bill released by the U.S. House of Representatives on July 11. Appropriations leaders in the Senate drafted their bills according to the austere topline funding caps provided under the "Fiscal Responsibility Act," the agreement reached between President Biden and House Speaker Kevin McCarthy (R-CA) that allowed the federal debt ceiling to be raised. Under the terms of the deal, in exchange for raising the federal debt ceiling until 2025, FY24 spending will be capped at approximately FY23 levels, and a spending increase of only 1% will be allowed for domestic programs in FY25.

Despite these tight topline numbers, and thanks to the hard work and dedication of advocates across the country and our champions in Congress – including THUD Subcommittee Chair Brian Schatz (D-HI), Ranking Member Cindy Hyde-Smith (R-MS), Committee Chair Patty Murray (D-WA), and Vice-Chair Susan Collins (R-ME) – the Senate THUD bill proposes increased funding for key HUD programs, particularly those vital to getting or keeping people with the lowest incomes housed.

The bill proposes funding the Tenant-Based Rental Assistance (TBRA) and Project-Based Rental Assistance (PBRA) programs at levels expected to be sufficient to renew existing contracts and provides funding for an additional 4,000 vouchers targeted to veterans at risk of or experiencing homelessness and youth aging out of foster care. The bill proposes an increase to HUD's Homeless Assistance Grants (HAG) program, which is vital to connecting people experiencing homelessness with the resources and support they need to find and maintain safe, stable housing. The bill also increases funding for the Native American Housing Block Grant and Public Housing Operating Fund and preserves $20 million for legal assistance to prevent evictions – all NLIHC priorities.

Other important programs would receive increased funding, including Housing Opportunities for Persons with AIDS (HOPWA) and the recently authorized Grants to Identify and Remove Barriers to Affordable Housing program. Still other programs, including Tribal Housing Competitive funds, Native Hawaiian Block Grants, the HOME Investment Partnership Program (HOME), Section 202 Housing for the Elderly, Section 811 Housing for Persons with Disabilities, Housing Counseling Assistance, and fair housing programs, would receive level funding.

Only several HUD programs would be subject to funding cuts under the Senate's proposal, including the Public Housing Capital Fund, Choice Neighborhoods Initiative, and the Healthy Homes and Lead Hazard program. The Community Development Fund would also face a cut, but only in congressionally directed spending (also known as "earmarks").

Senate Appropriations Committee members met the same day to review and vote on the bill, a process known as "Committee markup." In her opening remarks, Chair Murray praised the bill for providing needed funding increases to ensure housing assistance programs – like TBRA and PBRA – would be fully renewed and for increased assistance for HAG.

"The investments in this bill are critical to make sure people aren't left on the streets or out in the cold and to get people and goods where they need to go in a safe, timely way," she said. "I'm glad we are able to maintain and build on some key investments in this bill that provide rental assistance to families in need, increase our housing supply, support maintenance for distressed properties, and connect people with health care, financial education, employment programs, and other support services."

"Good steps to be sure," she continued, "but I want to make it clear that the housing and homelessness crisis in this country will take a lot more than the flat funding in most areas and the modest funding increases in some programs we've managed to negotiate under the tough caps in the debt ceiling deal. I hope we can come together in a bipartisan way to talk about the kind of investments and policies we will need to really tackle these challenges in a serious way."

"Despite a challenging budget year, the bill maintains existing rental assistance for more than 4.6 million households and continues to make meaningful investments aimed at tackling homelessness," said Vice Chair Collins. "I thank Ranking Member Hyde-Smith for her work in crafting this legislation, and as the Vice Chairman of the Appropriations Committee, I will continue to advocate for this funding as the appropriations process moves forward."

"We [are maintaining] federal rental assistance on which working families, seniors, and others rely, while also adding resources to end homelessness among veterans and youth," said THUD Ranking Member Hyde-Smith during the markup. THUD Chair Schatz agreed in his remarks, noting "our bill directly addresses America's housing crisis by protecting affordable housing and homeless assistance programs that will help nearly 10 million people."

The Senate bills represent the “high water mark” for appropriations funding in the coming fiscal year. While Senate appropriators wrote their bills according to the agreed-upon topline in the “Fiscal Responsibility Act,” House appropriators – caving to the demands of the far-right House Freedom Caucus – wrote their domestic spending bills to FY22 levels. While the House THUD bill proposes to cut funding drastically and even zero out funding for some HUD programs, it spares some key programs that get or keep the lowest-income people housed.

The discrepancy between House and Senate funding levels foreshadows what will likely be a contentious appropriations process when Congress returns from recess in September. Appropriators have until September 30 either to reach an agreement on spending bills for FY24 or to pass a continuing resolution (CR) to provide short-term funding to keep the federal government running. Failure to adopt one of these approaches would result in a government shutdown.

House and Senate FY24 THUD Spending Bills Advance Out of Appropriations Committees

Both the U.S. House of Representatives and U.S. Senate Committees on Appropriations met to review and vote on their respective proposals for the Transportation, Housing and Urban Development (THUD) FY24 spending bill. Stark differences in the bills foreshadow what will likely be a difficult appropriations process when Congress returns from recess in September.

The full House Appropriations Committee met on July 18 to review and vote on the House’s proposed THUD spending bill, which would provide HUD with $68.2 billion – a $6.4 billion (or approximately 10%) increase from FY23-enacted levels. HUD needs to increase funds by an estimated $13 billion over the previous year’s funding to maintain existing levels of assistance. House Appropriators, bending to the demands of the far-right House Freedom Caucus, agreed to mark up their domestic spending bills to FY22 levels, resulting in a proposed $131 billion cut from FY23 levels. While the bill does propose deep cuts to or even the elimination of some HUD programs, it does not – as NLIHC and our partners urged – cut funding for most rental assistance programs. For more details on the House proposal, see NLIHC’s full analysis.

Committee Chair Kay Granger (R-TX) and THUD Subcommittee Chair Tom Cole (R-OK) provided opening remarks praising the bill for fully funding renewals for housing assistance and for making historic investments in housing programs that serve Native communities.

“The housing programs in this bill provide support for working families, the elderly, the disabled, and veterans,” said Chair Granger. Chair Cole elaborated, noting the bill ensures “a responsible safety net with housing support for our most vulnerable citizens.” Chair Cole also expressed pride that the bill “[restores] the Indian Housing Block Grant program to $1.1 billion, catching up to an inflation-adjusted 1998 level.”

House Appropriations Committee Ranking Member Rosa DeLauro, however, expressed her dissatisfaction with the bill, stating it relies on “recessions and budget gimmicks” to fill in funding gaps, including “pulling back over half a billion dollars for health hazards remediations in low-income housing, and weaking the enforcement of the Internal Revenue Service to benefit the wealthiest Americans." To increase funding for certain vital HUD programs while still drafting bills to FY22 funding levels, House Republicans propose rescinding over $564 million in unobligated balances from the Office of Lead Hazard Control and Healthy Homes and $25 billion in IRS funding provided in the "Inflation Reduction Act."

Committee review of a bill – known as "Committee markup" – provides members the opportunity to propose and vote on amendments to the bill under review. Members proposed a number of amendments that were adopted or rejected along party line votes. Representative Barbara Lee (D-CA) offered an amendment that would have revoked the bill's prohibition on using funds to advance HUD's Affirmatively Furthering Fair Housing (AFFH) rule, which establishes parameters for how communities can actively work to undo historic patterns of discrimination. The amendment, however, was not adopted after a party line vote of 27-34.

THUD Chair Cole offered a controversial amendment that would strip three community development projects of funding because they serve members of the lesbian, gay, bisexual, transgender, and queer (LGBTQ) community. Committee Democrats banded together in outcry at the amendment, with Ranking Member DeLauro accusing Republican appropriators of "negotiating with terrorists" for bending to the will of the party's far-right wing. The Ranking Member also pointed out that, historically, neither Republicans nor Democrats have attempted to strip funding from community development projects on ideological grounds.

"This is below the dignity of this committee," said Representative Mark Pocan (D-WI), an openly gay man, during the amendment debate. "There is absolutely no excuse; the fact is that, for too many people, unless they're personally affected, they don't give a damn." Representative Pocan went on to tell his colleagues about the harassment and violence he has faced as a gay man, including receiving death threats when he ran for Congress and being followed and violently beaten after leaving a gay bar.

"This is what you guys do by introducing amendments like this, taking away from peoples' earmarks, taking away from your colleagues, who want to protect people on housing," continued the representative. "This is below where we all are. We have to have more respect and dignity for our constituents." Despite the outcry, the amendment was adopted along a party-line vote, 32-26.

In the Senate, the full Appropriations Committee met on July 20 to mark up and vote on its proposed FY24 THUD bill, the text of which was released the same day. Senate Appropriations Chair Patty Murray (D-CA) and Vice-Chair Susan Collins (R-ME) are writing their bills to the funding levels agreed upon in the "Fiscal Responsibility Act," which places funding caps on FY24 and FY25 spending in exchange for raising the debt ceiling until 2025.

Overall, the bill provides just over $70 billion for HUD's vital affordable housing, homelessness, and community development programs, an $8.26 billion (or roughly 13%) increase from FY23-enacted levels. The proposal would include enough funding to renew all existing TBRA and PBRA contacts and provide slight increases to the Homeless Assistance Grants program, Native American Housing Block Grants, and other vital programs. Other programs would receive level funding, and few would face cuts under the Senate's proposal. For more details, see NLIHC's full analysis of the Senate bill and our updated budget chart.

The Senate Committee's leaders have also reached an agreement to provide an additional $13.7 billion in emergency supplemental funding, including $8 billion for defense and $5.7 billion for non-defense domestic spending. "This additional funding is important for us to be able to continue to work together on a bipartisan basis to address the urgent challenges our country faces," said Chair Murray in her opening remarks. "And because – as the bills we are discussing today show – we aren't just talking about numbers on a page. We are talking about our country's competitiveness and leadership on the world stage, the safety and wellbeing of our families and communities, and the future for our children."

"Despite a challenging budget year, the bill maintains existing rental assistance for more than 4.6 million households and continues to make meaningful investments aimed at tackling homelessness," said Vice Chair Collins in her opening remarks. The Vice Chair – who previously led the THUD Appropriations Subcommittee – also voiced her commitment to "continue to advocate for [HUD] funding as the appropriations process moves forward."

The full Senate Appropriations Committee reviewed and passed the THUD spending bill with bipartisan support and without adding on discriminatory or problematic amendments in a 29-0 vote.

Take Action!

With the House and Senate bills released, appropriators will need to turn their attention to reaching a compromise funding bill with the bipartisan support that will be required for the bills to pass both chambers.

Thanks to the hard work of advocates across the country, who mobilized to weigh in with their elected officials, HUD's vital rental assistance, homelessness assistance, and tribal housing programs were spared from cuts in both the House and Senate bills. Yet advocates still have work to do to ensure these funding levels remain in a final bill and that other critical programs, such as Public Housing, are also fully funded.

Keep making your voice heard, and tell Congress that it cannot balance the federal budget at the expense of people with the lowest incomes! Advocates can take action TODAY in the following ways:

- Contact your senators and representatives to urge them to expand – not cut – investments in affordable, accessible homes through the FY24 spending bill!
- August recess is the perfect time for advocates to schedule in-district meetings with their members of Congress to urge them to support higher funding for affordable housing and homelessness programs. Check out NLIHC's updated *Congressional Recess Toolkit* for information on how to set up in-district meetings, meeting tips, talking points, and more!
- Join over 2,000 organizations by signing on to a national letter from the Campaign for Housing and Community Development Funding (CHCDF), calling on Congress to

oppose budget cuts and instead to support the highest level of funding possible for affordable housing, homelessness, and community development resources in FY24.

Low-Income Housing Tax Credit

NLIHC and 14 Other Organizations Urge FHFA to Close Qualified Contract Loophole, Maintain LIHTC Affordability

NLIHC joined a letter with 14 other national housing advocacy organizations to Federal Housing Finance Agency (FHFA) Director Sandra Thompson urging FHFA to prohibit the Government Sponsored Enterprises (Fannie Mae, Freddie Mac, and the Federal Home Loan Banks) from funding Low-Income Housing Tax Credit properties in which the property owner has not waived their “Qualified Contract” rights. The “Qualified Contract” loophole allows for properties to prematurely end their affordability requirements, and the use of this loophole results in the loss of approximately 10,000 affordable housing units annually. NLIHC joined the letter to promote preservation of affordable housing developed by the LIHTC program, which remains the primary source of federal funding for the construction and preservation of affordable housing.

The Low-Income Housing Tax Credit is the largest source of federal financing for the construction and preservation of affordable housing, but LIHTC on its own rarely builds or preserves homes affordable to households with the lowest incomes. As a subsidy for housing developers, LIHTC requires developers to maintain affordability for 30 years. However, the “Qualified Contract” (QC) provision in the LIHTC regulation allows developers to waive these affordability requirements after only 15 years. The QC loophole is a threat to long-term affordability in the LIHTC program. Research from NLIHC and the Public & Affordable Housing Research Corporation (PAHRC) estimates that more than 100,000 LIHTC units have been lost to the QC loophole since 1990. The National Council of State Housing Agencies (2021) cites similar estimates.

The letter urges FHFA to take regulatory action to prohibit the Government Sponsored Enterprises from providing financing “for properties that could or did take advantage” of the QC loophole. The Biden administration has supported such efforts in the past, such as recent action by the U.S. Department of the Treasury to require LIHTC owners to waive their QC rights when using State and Local Fiscal Relief Funds for LIHTC development.

Read the letter at: https://tinyurl.com/4u3ep8rw

Read more about SLFRF funds on NLIHC’s webpage here.

Fair Housing

NLIHC Joins Other Fair Housing Organizations in Urging Congress to Reject Proposals to Defund Fair Housing Enforcement; Rep. Barbara Lee Supports Fair Housing Funding

NLIHC, together with the National Fair Housing Alliance and local fair housing organizations, sent a letter urging leaders in the U.S. Senate's Committee on Appropriations to reject legislative proposals ("riders") that prohibit funding for implementation of the proposed "Affirmatively Furthering Fair Housing" (AFFH) rule in fiscal year (FY) 2024 appropriations. Republicans in the U.S. House of Representatives' Committee on Appropriations' Subcommittee on Transportation, Housing and Urban Development (THUD) included language in their FY24 appropriations bill (see *Memo* 7/16) prohibiting HUD funds from being used to "implement, administer, or enforce" the proposed AFFH rule. In addition to action by advocates, Representative Barbara Lee (D-CA) proposed an amendment to remove from the House THUD bill the Republicans' rider defunding AFFH in order to maintain funding for HUD's enforcement of fair housing. Unfortunately, the amendment failed on a vote of 27-34. NLIHC's letter was sent to Senate appropriations leaders in anticipation of the Senate's hearing on the THUD appropriations bill, which occurred on July 20.

In February 2023, the proposed Affirmatively Furthering Fair Housing rule was published in the *Federal Register* to much applause by national housing organizations and civil rights leaders. If finalized, the proposed rule would help communities meet a 55-year-old requirement to actively address systemic racism and segregation, which have often resulted from specific federal policies. The proposed rule would seek to improve a 2015 rule issued by the Obama administration that was suspended abruptly and replaced by the Trump administration in 2018. (For more on the proposed AFFH rule, see *Memo* 2/13.) NLIHC submitted a comment in April supporting the proposed rule and suggesting further improvements (see *Memo* 5/1).

By adding language to prohibit HUD funds from being used to "implement, administer, or enforce" the proposed AFFH rule, House Republicans used the FY24 appropriations process to defund the AFFH proposed rule. In response, Representative Barbara Lee (D-CA) offered an amendment to remove the language. In a press statement addressing the amendment, Representative Lee explained that "[t]he majority argues that fair housing rules 'burden' local governments. But I ask them – What about the burden on working families who cannot find a place to live because landlords think they look different? What about the burden on homeowners robbed of their hard-earned equity because of appraisal discrimination? What about the burden on disabled veterans and people who identify as LGBTQ+ who are denied fair housing? The Republican bill blocks all these people from getting a fair shake."

While the amendment failed on a 27-34 vote, advocates will continue to voice strong support for fair housing enforcement and reject HUD spending cuts and instead voice their support for the highest possible funding for housing in the appropriations process.

Read the letter from NLIHC and fair housing advocates at: https://tinyurl.com/mryp95bw

More information about Affirmatively Furthering Fair Housing is on page 8-12 of NLIHC's *2023 Advocates' Guide*.

Read Representative Barbara Lee's press statement on her amendment at: https://tinyurl.com/5569224e

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Congress

NLIHC, National Housing Law Project, and Poverty & Race Research Action Council Oppose Rural Opportunity Zones in House Tax Bill

NLIHC joined the National Housing Law Project and Poverty & Race Research Action Council (PRRAC) in submitting a letter to U.S. House of Representatives Speaker Kevin McCarthy, Minority Leader Hakeem Jeffries, and leaders on the House Committee on Ways and Means. The letter opposes the expansion of Trump-era "Opportunity Zones" in rural communities. House Ways and Means Committee Chair Jason Smith (R-MO) has introduced a bill, the "Small Business Jobs Act" (H.R. 3937), which would establish Opportunity Zones in rural areas and has stated his intention of bringing the bill to the full House floor for a vote. NLIHC has consistently opposed Opportunity Zones, as the tax incentive does not require low-income residents of a zone to realize any benefits, and the incentivize lacks accountability to the communities impacted.

Opportunity Zones (OZs) were created in the "Tax Cuts and Jobs Act of 2017," the massive, nearly $2 trillion tax cut legislation signed into law by President Donald Trump. "Since its inception, the OZ program has been detrimental to low-income communities and communities of color," the letter states. "The program, originally touted as an unregulated economic growth and business development incentive, bore out as a real estate finance giveaway from the federal government." Neither the original legislation nor its final regulations require investments to benefit low-income residents in the form of creating or preserving affordable housing or providing jobs, and the OZ regulations lack protections to prevent displacement of low-income residents and long-time neighborhood small businesses.

Expanding Opportunity Zones to rural areas would do little if anything to address the housing supply and affordability crisis in rural America. The letter concludes: "Just as the OZ program has failed to produce meaningful change in America's divested urban communities, the Rural Opportunity Zone program is sure to bring little to no relief to struggling rural communities. Instead, the Rural Opportunity Zone program promises to continue enriching real estate corporations and investors at the expense of low-income rural families."

As tax committees in Congress craft legislation to help families struggling with rising housing costs, NLIHC urges Congress to include the "Affordable Housing Credit Improvement Act" (AHCIA) (S.1557/H.R.3238) in an end-of-year tax bill. Among other improvements, the AHCIA would designate rural areas as "Difficult to Develop" (DDA), providing rural communities with an added financial boost in building affordable housing through the Low-Income Housing Tax Credit (LIHTC).

Read the letter from NLIHC, NHLP, and PRRAC at: https://tinyurl.com/yc67wjhk

Read more about Opportunity Zones on page 9-7 of NLIHC's *2023 Advocate's Guide*.

Read more about NLIHC's proposed reforms to the Low-Income Housing Tax Credit at: https://bit.ly/3NwGo6b

Urge your members of Congress to pass LIHTC reforms through the Affordable Housing Credit Improvement Act at: https://p2a.co/ZhQtlH2

Disaster Housing Recovery

HUD Releases Civil Rights Guide for Long-Term Disaster Recovery Grantees

HUD's Office of Fair Housing and Equal Opportunity has published a "Grantee Guide" to help state, territory, tribal, and local government recipients of long-term recovery funds meet fair housing and civil rights obligations.

Those receiving HUD long-term disaster recovery funds through the agency's Community Development Block Grant-Disaster Recovery (CDBG-DR) program are required to adhere to fair housing and civil rights laws, including the "Fair Housing Act," the "Civil Rights Act of 1964," the "Rehabilitation Act of 1973," the "Americans with Disabilities Act," and the "Housing and Community Development Act of 1974." The regulatory requirements applying to each set of funds are laid out in allocation notices released by the agency in the *Federal Register*. HUD recently consolidated requirements for all disaster funds released by the agency since 2020 in a consolidated notice released last year.

To accompany the consolidated notice, HUD's Office of Fair Housing and Equal Opportunity has published a detailed guide to assist the recipients of these funds in ensuring that they are following all required civil rights laws when crafting the disaster recovery programs that will use the HUD funding. The guide covers all aspects of the program creation process – including the definition of unmet needs after disasters, accessibility requirements for individuals with disabilities, ongoing monitoring of subrecipients of the funds, and examples of data sources to use in equity analysis.

Read the guide at: https://bit.ly/3Q80yEL

HUD

HUD Issues Request for Comments Regarding HUD Administrative Burdens on Residents When Accessing and Keeping Housing Assistance

HUD published a Request for Comments in the *Federal Register* on July 13 seeking input from the public regarding the burdens faced when applying or maintaining eligibility for HUD's housing programs. HUD requirements often entail completing and submitting a variety of forms to determine eligibility for assistance. HUD recognizes that its administrative requirements and paperwork burdens disproportionately fall on the most vulnerable people and prevent them from accessing benefits for which they are legally eligible. HUD states that responses will assist the department in identifying, understanding, and reducing administrative burdens connected to HUD housing programs, thereby helping HUD advance its mission. HUD is also inviting comments from local and state entities that administer HUD programs. Comments are due by August 14.

HUD is interested in hearing about individuals' experiences related to applying for or accessing HUD programs and services, as well as experiences related to maintaining eligibility for those programs and services, which might include activities such as ongoing reporting requirements or recertification activities. HUD is interested in understanding burdens associated with completing or submitting specific forms or sets of forms, as well as suggestions for opportunities to improve a form or experience by improving the requirements, phrasing, design, or associated processes connected to the form.

While HUD welcomes all relevant comments, its request also poses a number of specific questions, such as:

- Is information currently being collected by HUD or HUD program administrators that has no apparent use or benefit, or that can be streamlined?
- Are eligibility requirements or questions on a form that are difficult to understand or respond to?
- Does a form have documentation features that could be made simpler or be required less frequently?
- Are there specific challenges for people with physical, speech, or other communication-related disabilities?
- Are there specific challenges for people with limited English proficiency?
- Are data currently collected by other programs or agencies that if shared with HUD or administrators of HUD programs could reduce the information collection burden of HUD's programs?

The *Federal Register* version of the Request for Comments is at: https://tinyurl.com/4etsp5zy

An easier-to-read version of the Request for Comments is at: https://tinyurl.com/3rdn3z2b

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Events

HUD to Host Event on Tenant Rights on July 25

HUD will host a hybrid event, "National Conversation @ The Community Table," on Tuesday, July 25, from 11:00 am to 1:30 pm ET. During the event, HUD staff will discuss the agency's progress advancing the commitments made in the *Blueprint for a Renters Bill of Rights*, a document released by the White House in January 2023, and educate attendees about tenants' rights and tenant protections in HUD-funded properties. Register for the event here.

In addition to HUD officials, the event will feature tenant leaders who will offer their own reflections on the push for stronger tenant rights, as well as sessions exploring local applications of the principles articulated in the *Blueprint for a Renters Bill of Rights*, namely:

- Access to safe, quality, accessible, and affordable housing.
- Clear and fair leases.
- Education, enforcement, and enhancement of rights.
- The right to organize.
- Eviction prevention, diversion, and relief.

Throughout, participants will be invited to weigh in on these principles and offer suggestions for improvements.

The event is open to members of the public, including tenants and renters, public housing authority staff, multifamily owners and landlords, elected and appointed officials, and advocacy and grassroots organizing coalitions. Register for the event here.

From the Field

Rhode Island Passes Multiple Protections for Tenants in Recent Legislative Session

Tenant advocates in Rhode Island secured several housing policy wins during the 2023 legislative session, signaling a commitment among lawmakers to enact permanent tenant protections that divert the threat of evictions and keep renters stably housed amid a worsening housing crisis in the state. After identifying housing as its top priority this year, Rhode Island's 2023 General Assembly passed legislation in June involving the creation of a statewide rental registry, prohibitions on rental application fees, and the sealing of eviction records under certain circumstances, among several other pieces of housing-related legislation.

By enacting such protections, legislators in the state seek not only to protect tenants from the disparate impact of rising rental costs, which have increased by more than 11% over the past year, but also to keep renters stably housed amid a shortage of affordable and available rental units for the state's lowest-income renters – a shortage that was only compounded by the COVID-19 pandemic and its effect on statewide eviction rates. Notably, with the passage of Senate Bill 912, Senate Bill 804, and House Bill 6329, Rhode Island becomes one of only a few states nationwide to have created not only a statewide rental registry but to have enacted legislation prohibiting landlords from charging prospective tenants application fees and allowing eviction records to be sealed from public view.

Efforts conducted by housing advocates were critical to securing protections for renter households. Before the General Assembly voted on the three major housing bills in front of the Assembly in June, tenant advocates held a "Homes for All" rally at the Rhode Island State

House, urging lawmakers to focus on enacting legislation that protected renters at risk of eviction. One of the groups involved in advocating for the passage of more permanent protections for tenants was the Housing Network of Rhode Island (HNRI), a member of NLIHC's 2022-2023 End Rental Arrears to Stop Evictions (ERASE) Cohort.

"The Homes RI coalition and our backbone organization, Housing Network of Rhode Island, are extremely encouraged that this session, our State General Assembly recognized the need for expanded tenant protections in addition to focusing on housing production and land use reforms," said Katie West, the director of strategic initiatives at HNRI. "Among key legislative successes, we are celebrating the passage of legislation that prohibits rental application fees, establishes a statewide rental registry, and allows for the sealing of eviction records in certain circumstances. These types of policies are essential to leveling the playing field for tenants and increasing housing stability while we also undertake measures to address housing supply and affordability. The passage of these bills demonstrates that elected officials are responding to the housing crisis and helps set a foundation for a forward trajectory. We applaud our General Assembly for their leadership. Ultimately, we could not have secured these wins without the support of fellow housing advocates, and we are deeply grateful for our local partners and the national the partnership of the ERASE cohort in this work."

As a result of the passage of Rhode Island's rental registry bill this year, landlords will be mandated to register their property in order to protect renters from the threat of being poisoned by lead in older homes. As required by the bill, every rental property will have to register with the state's Department of Health, and any rental unit that was built before 1978 (that is, before lead paint was outlawed) will need to be certified as safe. Any landlord who refuses to register their property or secure the necessary certification from the Department of Health will be subject to a fine of $1,000 per violation, per person.

Additionally, under the state's application fees bill, no landlord, broker, property manager, or property owner is allowed to ask any potential tenant to pay a rental application fee. In the state, on average, rental application fees result in a total of $500 to $750 being spent on miscellaneous rental application-related costs, with prospective tenants usually applying for more than a dozen units at a time. The bill also allows for "portable" background checks, meaning that tenants will be allowed to provide their own credit and background checks to landlords who require them, as long as checks have been made within 90 days, allowing applicants to avoid having to pay for new checks every time they apply for a rental unit. The bill passed unanimously and with no debate on the House floor in April.

Rhode Island also joined 10 states, including the District of Columbia, that have enacted eviction record sealing or expungement legislation. Under Senate Bill 912, a tenant's eviction record may be sealed by the court at least 30 days after the conclusion of the eviction case. To apply to have an eviction record sealed, a landlord or tenant must file a motion with the court. The law includes important stipulations, however. To be eligible for sealing, an eviction case must either have been dismissed, or the terms of the judgement must have been satisfied, or any money owed to the landlord, on behalf of the tenant, must have been paid back. Under the new law, a tenant is only eligible to apply to have their record sealed once every five years.

As mentioned, HNRI is a member of the 2022-2023 ERASE Cohort. The 2022-2023 ERASE Cohort is a group of 34 state and local nonprofit organizations that are conducting on-the-ground partnership development, capacity building, outreach and education, and policy reform/systems change work to promote housing stability, advance equity, and prevent evictions for renter households all over the nation. On July 27, HNRI will be featured as a panelist in NLIHC's ERASE summer webinar series highlighting the efforts of cohort members to enact tenant protections at the state and local levels. Register for the webinar here.

Learn more about NLIHC's ERASE project at: https://nlihc.org/erase-project

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Opportunity Starts at Home

New Data Show Redlining Linked to Worse Cardiovascular Health for Veterans

A new research study published by the *JAMA Network* finds links between the practice of redlining and worse cardiovascular health among U.S. veterans. The study was conducted using data from the Home Owners' Loan Corporation (HOLC), census data, and the medical records of patients served by the U.S. Department of Veterans' Affairs. Patients living in areas with a higher HOLC grade were more likely to be white and more likely to have lower rates of cardiovascular risk factors, including a history of smoking, chronic kidney disease, high blood pressure, and obesity. In formerly redlined neighborhoods, however, patients were more likely to have been diagnosed with chronic kidney disease, heart failure, diabetes, and chronic obstructive pulmonary disease. Read an article about the research here, and access the study here.

Research

Subsidized Renters Are Significantly Less Prepared for Disasters Compared to Unsubsidized Renters

An article published in *Housing Policy Debate*, "Disaster Preparedness and Housing Tenure: How Do Subsidized Renters Fare?," examines the differences in disaster preparedness among homeowners, unsubsidized renters, and subsidized renters. The authors find that, even when controlling for demographic and neighborhood characteristics, renters are significantly less prepared for disasters than homeowners, and subsidized renters are significantly less prepared than unsubsidized renters.

The research focused on two questions: (1) Do subsidized renters differ from unsubsidized renters and homeowners in their disaster preparedness?; and (2) Do differences in disaster preparedness persist after controlling for those characteristics that make subsidized renters more socially vulnerable to disasters? The researchers used data from the 2017 American Housing Survey (AHS) and divided responses into three groups: those of homeowners, unsubsidized renters, and subsidized renters. Subsidized renters included households that live in public housing, receive vouchers from the Housing Choice Voucher program, or live in a project-based, subsidized multifamily unit.

The researchers found that renters are significantly less prepared than homeowners when it comes to having non-perishable food, water, prepared emergency kits, evacuation funds of up to $2,000, evacuation vehicles, renter's insurance, carbon monoxide detectors, and generators. Comparing unsubsidized renters and subsidized renters, subsidized renters were significantly less likely to have evacuation funds, an evacuation vehicle, a generator, and renter's insurance. However, the research found that subsidized renters were significantly more likely than both unsubsidized renters and homeowners to have a disaster communication plan.

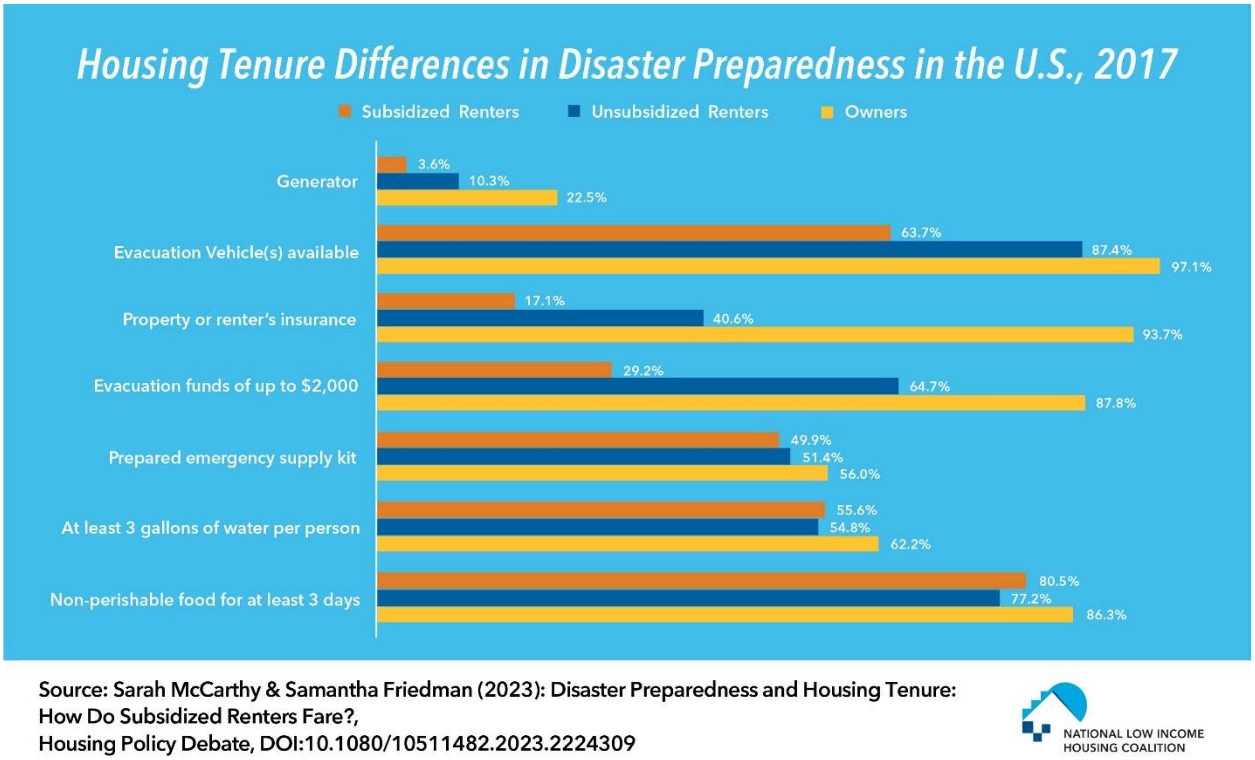
Prior research has found a relationship between disaster preparedness and factors, such as poverty, low education attainment, and poor conditions of units and neighborhoods, that make households socially vulnerable to disasters. The researchers found that renters are more likely than homeowners to be non-white, have less income, and have lower education levels. Subsidized renters are even more likely than unsubsidized renters to have these characteristics. The researchers also found that subsidized renters are more likely than unsubsidized renters and homeowners to live in older housing units and multifamily units. Even after controlling for these factors, the researchers found that subsidized renters were significantly less likely to be prepared for disasters compared to homeowners and unsubsidized renters in terms of having evacuation funds, an evacuation vehicle, a generator, and renter's insurance. The researchers concluded that subsidized renters' lower levels of disaster preparedness are not simply due to the characteristics that make them socially vulnerable but instead could be attributed to other factors, such as the location or management of subsidized units.

The authors conclude that policy measures should be taken to ensure subsidized renters are better prepared for disasters. The authors suggest the need for better federal oversight of PHA disaster preparedness policies and procedures, for example, through audits of PHA disaster management plans and the collection and publication of data related to how PHAs prepare residents for disasters. They also suggest that disaster preparedness for subsidized renters could be improved through dedicated funding and grants that would enable PHAs to implement federal guidance and could allow HUD to better track how PHAs are preparing residents.

Read the article at: bit.ly/44VVasG

Fact of the Week

Renters Are Less Prepared for Disasters Than Homeowners



Source: Sarah McCarthy & Samantha Friedman (2023): Disaster Preparedness and Housing Tenure: How Do Subsidized Renters Fare?, *Housing Policy Debate*, DOI: 10.1080/10511482.2023.2224309

NLIHC in the News

NLIHC in the News for the Week of July 16

The following are some of the news stories to which NLIHC contributed during the week of July 16:

- "UPS Is Failing Part-Time Workers Like Me" *Yahoo News*, July 21 at: https://tinyurl.com/abf47kza
- "6 States Where You Need to Make at Least $30 an Hour for a Spare Bedroom" *Nasdaq*, July 19 at: https://tinyurl.com/rp3m3whv
- "Five non-climate reasons why danger of extreme heat is rising" *The Hill*, July 15 at: https://tinyurl.com/y5wp5v82

NLIHC News

Where to Find Us – July 24

- Henry George School of Social Science Annual Conference – Virtual, July 24 (Lindsay Duvall)
- YIMBY Action Federal Affordable Housing Webinar – Virtual, July 27 (Diane Yentel)
- Ayuda Legal Puerto Rico, 5th Annual Just Recovery Summit – San Juan, PR, August 10-11 (Noah Patton and Sidney Betancourt)
- Ability Housing, Inc. Annual Summit – Kissimmee, FL, September 12-13 (Diane Yentel)
- Neighborhood Preservation Coalition of New York Annual Conference – Saratoga Springs, NY, September 19 (Lindsay Duvall)

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